

VI

That subsequently Defendant has departed for Asheville, North Carolina, without paying the amount due under the contract of One Thousand Four Hundred Forty and No/100 (\$1,440.00) Dollars.

VII

That at the time in question when said contract was performed the Defendant was residing at Tugaloo Road in Traveler's Rest, South Carolina, and that sometime during the month of March the Plaintiff is informed and believes, that the said Defendant made said move with the manner and intent to defraud his creditors and is now removed from lawful service of summons and by that reason the Plaintiff is entitled to an action of attachment of real estate under the Code of Laws of South Carolina 1962, Section 10-901, et. al.

VIII

The description of the real estate to be attached is described as follows:

All of that lot of land in the County of Greenville, State of South Carolina, shown as Lot number 79, Coleman Heights, recorded in the R.M.C. Office for Greenville County in Plat Book RR, at page 115, at Tugaloo Road, and being the same conveyed to Charles A. Simmons in Deed Book 1005, page 263.

WHEREFORE, Plaintiff prays judgement against the Defendant in the sum of One Thousand Four Hundred Forty and No/100 (\$1,440.00) Dollars, together with the court costs and for such other relief deemed just and proper by this court, and that an attachment be issued against the property above described out of which to satisfy any judgement obtained by the Plaintiff.



Douglas F. Dent
Attorney for Plaintiff